

HILDA MAE MORGAN
Route 13, Box 161
Frederick, Maryland 21701

vs.

HARRY JUNIOR MORGAN
3539 Roy Shafer Road
Middletown, Maryland 21769

* NO. 31, 126 EQUITY
* IN THE
* CIRCUIT COURT
* FOR
* FREDERICK COUNTY, MARYLAND

* * * * *

BILL FOR PARTITION OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Hilda Mae Morgan, Petitioner, by Franklin D. Stillrich, her solicitor, respectfully represents unto your Honorable Court:

FIRST: That by a Decree of the Circuit Court for Frederick County, Maryland, dated 19th day of February, 1981 in No. 28,375 Equity, your Petitioner was divorced A VINCULO MATRIMONII from the Respondent, Harry Junior Morgan. A copy of said Decree is attached hereto as Complainant's Exhibit No. 1.

SECOND: That your Petitioner and the Respondent are owners, in fee simple, as tenants in common, of that real estate lying in Jefferson Election District, as more particularly described and conveyed in a deed from Arthur H. Huffer and Mary L. Huffer, his wife to Harry Junior Morgan and Hilda M. Morgan, his wife, dated August 18, 1973 and recorded in Liber 921, Folio 732, among the Land Records of Frederick County. A copy of said deed is attached hereto as Complainant's Exhibit No. 2.


THIRD: That there are no liens or encumbrances against said property.

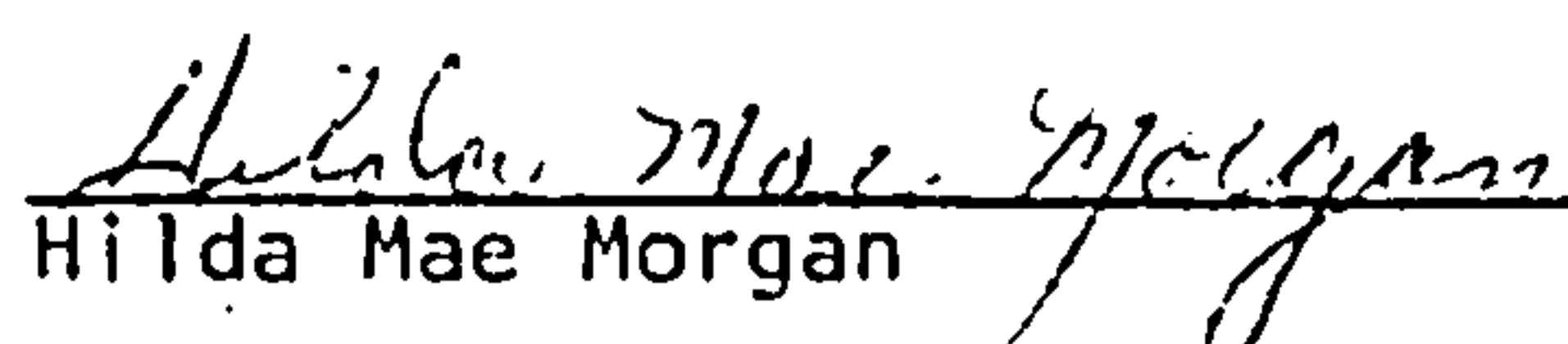
FOURTH: That your Petitioner desires that the subject real property and improvements be sold in lieu of partition because the said real property cannot be divided in kind without substantial loss of value.

WHEREFORE, your Petitioner prays for the following relief:

1. That the court pass an Order appointing Trustees to make a sale of the subject property in lieu of partition.
2. And for such further relief as the nature of her case may require.

And, as in duty bound, etc.


Franklin D. Stillrich
150 West Patrick Street
Frederick, Maryland 21701
Phone: 662-8114
Solicitor for Petitioner


Hilda Mae Morgan